

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

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(1) Digital wireless phones tested: Carrier operates a digital wireless system and acquires wireless telephone handsets manufactured by several handset vendors (collectively, "Vendors"). To Carrier's knowledge, two of the Vendors that carrier uses, Nokia and Motorola presently offer three handset devices that are compliant with the ANSI C63.19 standard ("Compliant Phones"). Accordingly, those three phone devices, Nokia 6102, Motorola V3 and Motorola V220 have been tested to date.

(2) Laboratory used: Carrier does not perform internal laboratory testing and instead, relies on its Vendors to conduct such testing, and to further rely on their representations regarding the compliance of each specific handset device.

(3) Test results for each phone tested: Nokia and Motorola report that the Nokia 6102 and Motorola V3 and V220 phones are compliant.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: The models referenced herein are rated M3 under standard ANSI C63.19-2005.

(5) Status of product labeling: Carrier typically relies upon its Vendors to label all products prior to their shipment to our retail locations. The Compliant Phones offered by Carrier contain M3 product labeling and additional information

(6) Outreach efforts: Highland has just recently started selling Compliant Phones, however, now that they have become available and are being publicly identified for consumers and audiologists, Carrier plans to implement advertising Compliant phones on

Carrier's web site. Carrier is implementing training for its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature will soon be provided at the point of sale, addressing the needs of individuals with hearing disabilities. Carrier plans to conduct a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers will soon be given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids. Flexible return policies will apply to consumers seeking to obtain Compliant Phones. Toward this end, Carrier has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, Carrier plans to conduct outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of Carrier's Compliant Phones in the form of handouts from Nokia and Motorola that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: All three of the handset models referenced herein are currently available at Carrier's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Carrier is unaware of any plans that its Vendors may have to incorporate HAC features into future handsets.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Carrier is in contact with its Vendors with regard to their incorporation of HAC features into future phones. Carrier is following its Vendor's efforts to provide hearing aid-compatible handsets and Carrier is ready and willing to offer compliant devices to interested customers, and will encourage its Vendors to expedite the availability of such handset devices.

(10) Number of compliant and non-compliant phone models offered at this time: Carrier's core assortment presently includes numerous models of digital handsets. Three of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any: There are no differences in handset offerings among regions in Carrier's service area. Carrier's handset offerings are presently consistent in all markets.

(12) Ongoing efforts for interoperability testing with hearing aid devices: Carrier will rely mainly upon its Vendor to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.